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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No.: 4:22-cv-01490-JST

**NETFLIX, INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
PLAINTIFF'S MATERIAL SHOULD
BE SEALED**

Judge: Hon. Jon S. Tigar

Pursuant to Hon. Jon S. Tigar's Standing Order Governing Administrative Motions to File Material Under Seal and Local Rule 79-5 Defendant Netflix, Inc. ("Netflix") hereby submits this Administrative Motion to Consider Whether Plaintiff's Material Should Be Sealed. On August 21, 2022, Netflix concurrently filed its Motion for Summary Judgment. Netflix's Motion for Summary Judgment references certain previously sealed documents containing Lauri Valjakka's financial information and license agreements as well as Lauri Valjakka's financial records and emails involving himself and/or his legal counsel (included hereto as Exhibits A-I to the Declaration of Rachael Lamkin in Support of this Motion ("Lamkin Declaration"))—all of which contain information that Plaintiff has designated as "Confidential" or "Highly Confidential Attorneys' Eyes Only" under the Stipulated Protective Order entered in this action on July 25, 2022 (ECF No. 56) or obtained from AiPi, LLC

(“AiPi”), Lauri Valjakka’s litigation funders, previously designated “confidential” under the same protective order as a part of the court-ordered forensic discovery in the United States District Court for the Eastern District of Virginia.

For purposes of this Motion, and pursuant to Local Rule 79-5(f)(1), Netflix identifies the following documents or portions of that have been designated as confidential:

<u>Document</u>	<u>Portions to be Considered to be Sealed</u>	<u>Designating Party</u>
Exhibit A (email from Eric Morehouse to Sally Fan dated June 12, 2023)	Entire document	AiPi designated “confidential”
Exhibit B (bank statement of CDN Licensing Oy dated April 29, 2022)	Entire document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”
Exhibit C (translated bank statement of CDN Licensing Oy dated July 30, 2022)	Entire document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”
Exhibit D (email from William Ramey to Eric Morehouse dated August 13, 2023)	Entire document	AiPi designated “confidential”
Exhibit E (email from Onni Hietlahti to Lauri Valjakka and Matti Sarahelmo)	Entire document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”
Exhibit F (email from Lauri Valjakka to Onni Hietlahti dated November 9, 2022)	Entire Document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”
Exhibit G (Bond agreement between CDN Licensing Oy and Scarabaeus Sacer Oy dated November 5, 2021)	Entire Document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”
Exhibit H (email from Onni Hietlahti to Lauri Valjakka and Matti Sarahelmo)	Entire Document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”

Exhibit I (email from Erick Robinson to Eric Morehouse dated November 13, 2021)	Entire document	AiPi designated "confidential"
Netflix's Motion for Summary Judgment	Highlighted portions containing potentially confidential information	Plaintiff Lauri Valjakka designated "Highly Confidential Attorneys' Eyes Only"

This motion is supported by the Lamkin Declaration and is being concurrently filed with a Proposed Order pursuant to this Court's Standing Order Governing Administrative Motions to File Material Under Seal.

Dated: August 21, 2025

Respectfully submitted,

By: /s/ Rachael Lamkin

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